

1 Ramon Rossi Lopez - rlopez@lopezmchugh.com
(California Bar Number 86361; admitted *pro hac vice*)
2 Lopez McHugh LLP
100 Bayview Circle, Suite 5600
3 Newport Beach, California 92660
949-812-5771

4 Mark Stephen O'Connor (011029) – mark.oconnor@gknet.com
5 Gallagher & Kennedy, P.A.
2575 East Camelback Road
6 Phoenix, Arizona 85016-9225
602-530-8000

7 *Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10
11 In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

12 **PLAINTIFFS' NOTICE OF FILING**
13 **REDACTED DOCUMENTS AND**
14 **EXHIBITS REGARDING PLAINTIFFS'**
15 **MOTIONS FOR SUMMARY JUDGMENT**
16 **IN THE BELLWETHER CASES**

17 In support of Plaintiffs' Motions to Seal and Notice of Lodging Documents Related
18 to Plaintiffs' Responses to Defendants' Motions for Summary Judgment (Docs. 7951,
19 8155, and 8184, Plaintiffs file the following redacted documents:

20 1. **Documents Related to Docket 8186:**

21 Plaintiffs' Omnibus Separate Statement of Facts in Support of Their Response to
22 Defendants' Motion for Summary Judgment in the Bellwether Cases.

23 Exhibit H-A: Selected Medical Records of Lisa Ann Hyde;

24 Exhibit H-B: Excerpts of 4/6/17 Deposition of David Henry, M.D.;

25 Exhibit H-C: Excerpts of 1/25/17 Deposition of Lisa A. Hyde;

26 Exhibit H-D: Lisa A. Hyde Fact Sheet;

27 Exhibit H-E: Excerpts of 3/23/17 Deposition of William T. Kuo, M.D.;

28 Exhibit H-F: Excerpts of 7/6/17 Deposition of Robert McMeeking;

Exhibit J-A: Selected Medical Records of Doris Jones;

Exhibit J-B: Excerpts of 3/23/17 Deposition of Anthony Avino, M.D.;

Exhibit J-C: Doris Jones Consent Form dated 8/23/10;

Exhibit J-I: Excerpts of 8/5/17 Deposition of David Chodos, M.D.;

Exhibit J-J: Excerpts of 3/23/17 Deposition of Kirstin Nelson, M.D.;

Exhibit J-Q: Excerpts of 7/18/17 Deposition of Mark W. Moritz, M.D.;

Exhibit M-A: Selected Medical Records of Debra Mulkey;

Exhibit M-C: Excerpts of 4/11/17 Deposition of Roderick Tompkins, M.D.;

Exhibit M-D: Excerpts of 2/8/17 Deposition of Debra Mulkey;

Exhibit M-E: Debra Mulkey Fact Sheet; and

Exhibit M-I: Excerpts of 6/1/17 Deposition of Pho M. Nguyen, M.D.

2. **Documents Related to Docket 8169:**

Plaintiff, Sherr-Una Booker's Supplement to the "Plaintiffs' Omnibus Separate Statement of Facts in Support of Their Response to Defendants' Motion for Summary Judgment in the Bellwether Cases."

3. **Documents Related to Docket 7953:**

Plaintiffs' Controverting Statement of Facts in Opposition to Bard's Motion for Partial Summary Judgment as to Plaintiffs Lisa and Mark Hyde's Claims;

Exhibit A: Excerpts of 8/23/17 Deposition of Tim Hug;

Exhibit B: Selected Medical Records of Lisa Hyde;

Exhibit C: Excerpts of 4/6/17 Deposition of David Henry M.D.; and

Exhibit D: Excerpts of 7/24/17 Deposition of Derek Muehrcke M.D.

4. **Documents Related to Docket 7952:**

Plaintiffs' Response in Opposition to Defendants' Motion for Summary Judgment as to Plaintiffs Lisa and Mark Hyde's Claims.

5. **Documents Related to Docket 7948:**

Exhibit 1: Selected Medical Records of Carol Kruse;

Exhibit 2: Excerpts of 4/3/17 Deposition of Mark Hutchins, M.D.;

Exhibit 3: Excerpts of 2/20/17 Deposition of Carol Kruse;

Exhibit 4: Declaration of Carol D. Kruse dated 9/27/17;

Exhibit 5: Excerpts of 2/20/17 Deposition of Diane Biere;

Exhibit 6: Expert Report of Christopher S. Morris, M.D.;

Exhibit 7: Excerpts of 4/4/17 Deposition of Shanon Smith, M.D.;

Exhibit 8: Excerpts of 7/21/17 Deposition of Darren Hurst, M.D.; and

Exhibit 9: Excerpts of 7/24/17 Deposition of Derek Muehrcke, M.D.

6. **Documents Related to Docket 7946:**

Exhibit A: Selected Medical Records of Debra Mulkey;

Exhibit B: Expert Report of Darren Hurst, M.D.;

Exhibit C: Excerpts of 4/11/17 Deposition of Roderick Tompkins, M.D.;

Exhibit D: Excerpts of 2/8/17 Deposition of Debra Mulkey; and

Exhibit E: Debra Mulkey Fact Sheet.

7. **Documents Related to Docket 7944:**

Exhibit 5: Excerpts of 2/3/17 Deposition of Alfred Jones, Sr.; and

Exhibit 6: Excerpts of 8/5/17 Deposition of David Chodos, M.D.

This 24th day of October, 2017.

GALLAGHER & KENNEDY, P.A.

By: /s/ Mark S. O'Connor

Mark S. O'Connor

2575 East Camelback Road

Phoenix, Arizona 85016-9225

LOPEZ McHUGH LLP

Ramon Rossi Lopez (CA Bar No. 86361)

(admitted *pro hac vice*)

100 Bayview Circle, Suite 5600

Newport Beach, California 92660

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Gay Mennuti